

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

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VICTOR SMITH,

Plaintiff,

vs.

EURO-PRO MANAGEMENT  
SERVICES, INC.,

Defendant.

Case No. 3:05-cv-1186-MEF

CLARA P. HACKETT, CLERK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

**DECLARATION OF ALLISON RHODES LOTT**

I, Allison Rhodes Lott, do hereby declare on penalty of perjury as follows:

My name is Allison Rhodes Lott and I am a resident of Longview, Texas. I was formerly employed by Euro-Pro Management Services, Inc., and worked at their facility in Auburn, Alabama. I personally know Victor Smith and I was employed with Euro-Pro during the time when Victor Smith was also employed with Euro-Pro.


During the time Victor and I were employees of Euro-Pro, Victor asked me on one occasion whether I dated black men. I later told Ashley Sheffield, another Euro-Pro employee that Victor had asked me this. I did not consider the question to be offensive or to be harassing. I never reported to anyone in management at Euro-Pro that Victor had asked me this question or that he had harassed me in any way. Subsequent to my telling Ashley Sheffield about this incident, Ashley and I were summoned to Chad Reese's office. Chad Reese is an engineer who worked in the Auburn Euro-Pro facility at the same time that Victor and I were employed there. Chad Reese initiated a conversation

with me in which he inquired into Victor's contact with Ashley, asking me if Victor was harassing me. I informed Chad Reese that Victor had not been harassing me in any way.

During the time I worked with Victor, he never did anything to me that I consider harassment and I never reported any harassment on his part to any supervisor with Euro-Pro.

I make this Declaration of my own personal knowledge and under penalty of perjury.

Executed this 22 day of November, 2006.

  
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ALLISON RHODES LOTT